Law Offices of Scott E. Kaplan, LLC 12 N. Main Street, P. O. Box 157 Allentown, New Jersey 08501 (609) 259-1112 Attorney for Debtor

## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:

KENNETH G. MC NEIL,

Chapter 11

Debtor

Case No. 15-14218-MBK

## DEBTOR'S CERTIFICATION IN OPPOSITION TO MOTION TO VACATE STAY

I, KENNETH G. MC NEIL, hereby certify to this Court as follows:

- 1. I am the Debtor in the above-captioned case and I make this Certification in opposition to the moving party's present motion.
- 2. I am the record title holder to the subject property.
- 3. As such, I wish to enter into an agreement to retain the property and pay the bank adequate protection payments to do so pending entering into another, mutually acceptable arrangement relative to Movant's mortgage.
- 4. In consideration of the above, I will agree to pay the mortgagee 60% of the mortgage's monthly principal and interest payment plus 1/12<sup>th</sup> of the annual real estate taxes and annual insurance premium as an adequate protection payment commencing immediately, pending entry into a mutually acceptable alternative mortgage payment agreement..
- 5. I certify that the foregoing statements are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Kenneth G. McNeil\_\_\_\_\_ Kenneth G. McNeil

Dated: April 24, 2017